# **EXHIBIT 4**

# EXHIBIT 4: ATTORNEY'S AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

DISPLAY TECHNOLOGIES, LLC,	§	
Plaintiff,	8 8	Case No: 1:20-cv-07803
vs.	§	PATENT CASE
CLOUD4WI, INC.,	§ § 8	
Defendant.	§	
COUNTY OF DALLAS		
STATE OF TEXAS	)	

#### AFFIDAVIT OF JAY JOHNSON

I, Jay Johnson hereby declare and state as follows:

- 1) The party against whom judgement is sought is not an infant, incompetent, or in military service.
- 2) On September 22, 2020, Plaintiff ("Display") filed a complaint against Cloud4Wi, Inc. ("Defendant") alleging infringement of U.S. Patent No. 9,300,723 (the '723 Patent) titled "Enabling social interactive wireless communications," by Defendant's Proximity Marketing system, and any similar products.
- 3) Service was properly effectuated by serving Defendant at The Corporation Trust Company located at The Corporation Trust Company at 1209 Orange St., Wilmington, DE 19801 on October 5, 2020.
  - 4) Defendant was required to file an answer to the complaint on October 26, 2020.
- 5) Defendant has defaulted in the appearance in the action because to date, it has not filed an answer or otherwise responded to the complaint.

- 6) On March 9, 2021, the Clerk of the Court issued the Clerk's Certificate of Default.
- 7) In evaluating damages for patent infringement, several factors must be examined, including but not limited to:
  - a. The Defendant's use of the technology that the subject patent covers, and
  - b. The Defendant's revenue derived from that usage.
- 8) According to Defendant's YouTube video demonstrating its Proximity Marketing tutorial, Defendant has been using its technology covered by '723 Patent at suit since at least June 14, 2014. *See*, **Exhibit A**.
- 9) Per ZoomInfo.com, Cloud4Wi, Inc, has an annual revenue of 5 million dollars. *See*, **Exhibit B**.
- 10) Crunchbase.com, Cloud4Wi, Inc has raised a total of 18.1 million dollars in funding to date, their latest funding being raised in series on February 18, 2020, October 2, 2017 and February 18, 2014. See, Exhibit C.
- 11) Based on figures from www.owler.com obtained on July 1, 2021, Defendant has an Estimated Annual Revenue of 10 million dollars per year. *See*, **Exhibit D**.
- 12) Without the benefit of discovery from Defendant and based on information and belief including **Exhibits A through D**, Display believes that Defendant has relied upon and utilized the technology embodied in the '723 Patent for a substantial portion of Defendant's business. *See*, Complaint at ¶11-25.
- 13) It is generally well-known and accepted that average royalty rates for patent licensing range from 3 to 6% of gross sales. Moreover, these rates are consistent with the information that the Plaintiff has been aware of for many years.

- 14) Based on the foregoing, Display believes a reasonable royalty in this case can be calculated as follows:
  - a. Defendant utilizing the technology embodied in the '723 Patent to produce 25% of its revenue. That revenue is 11 million dollars per year (using the median, 11 million dollars of the range of 5 to 18.1 million dollars per year as per **Exhibits B and D**).
    - b. Defendant should be assessed a conservative 3% royalty on its usage.
  - c. Defendant's usage of the asserted technology has existed for at least 3 years.

    See, Exhibit A.
  - d. Based on the above factors, Display calculates a reasonable royalty of \$630,000.00 U.S.D solely for past infringement over the last 3 years.
    - e. Attorney's fees and costs in this case is \$10,000.00 USD.
  - f. Thus, reasonable royalty as calculated above is \$630,000.00 plus \$10,000.00 [attorney's fees and costs], equaling \$640,00.00.
- 15) Alternatively, Display has previously licensed the '723 Patent, ranging from one-time payments of \$10,000.00 to \$130,000.00 U.S.D. in exchange for a license for the life of the '723 Patent.
- 16) Thus, Display believes that the appropriate measure of damages should be \$640,000.00 [\$630,000 + attorney fees and costs], but no less than \$130,000.00 U.S.D.
  - 17) This amount sought is justly due and owing, and no part has been paid.

#### 

Executed on July 26, 2021.

Jay Johnson

Sworn to and subscribed before me, Jeannine

day of July, 2021.

JEANNINE C. JIRAL Notary Public, State of Texas Comm. Expires 10-04-2024 Notary ID 10590336

NOTARY PUBLIC/STATE OF TEXAS

# **EXHIBIT A**



# Cloud4Wi Proximity Extends WiFi Marketplace Platform with Precisely Targeted Marketing Campaign Capability

June 17, 2014



Cloud4Wi introduces Cloud4Wi Proximity, a new application for venues to quickly deliver targeted, localized marketing campaigns to customers

**SAN FRANCISCO – June 17, 2014**—At the Wi-Fi Offload Summit, Cloud4Wi, the leading provider of next-generation cloud Wi-Fi platforms, will announce the release of Cloud4Wi Proximity, a new application for venues to quickly and easily deliver targeted, localized marketing campaigns to customers. Cloud4Wi executives will present details about the application at the Wi-Fi Offload Summit at Four Seasons Silicon Valley in Palo Alto. The Cloud4Wi Proximity application

## **⊕** CLOUD4WI

location-based and timed marketing campaigns that offer instant feedback and drive revenue.

Clicktotweet: @cloud4wii Proximity Extends Wi-Fi Marketplace Platform with Super-Targeted Marketing Campaign Capability #WiFi #marketing

Using a wizard approach, Cloud4Wi Proximity guides users through a simple four-step process for defining the campaign: 1) select a triggering event such as a site visit, a sign-in or a logout; 2) narrow the target of the campaign by specified conditions including demographic profile, device or time of day; 3) select appropriate channels for delivery such as SMS, email and/or social media; and 4) choose customized content, which can deploy images, rich text, video, coupons, surveys—whatever supports the message of the campaign. The Cloud4Wi Proximity application is also designed to capture valuable end-user demographics and purchasing patterns to provide venues with the metrics they need to strengthen brand promotion and make direct marketing campaigns more successful and cost-effective.

"Using Cloud4Wi Proximity, Wi-Fi venues can finally be rewarded for the connectivity service they provide—often for free—by setting up highly targeted, localized marketing campaigns quickly and with minimal effort," said Ivan Muccini, Vice President of Product Planning at Cloud4Wi. "For example, when a diner logs on to a restaurant's free Wi-Fi using Facebook and then finishes lunch and leaves, restaurant management can automatically send a SMS thanking her and offering a promotion for the next visit or a short survey about the dining experience. Proximity dramatically shortens the feedback cycle, thus delivering business value in real time."

"Cloud4Wi is one of the most promising cloud-based Wi-Fi service platforms that I've seen," said Claus Hetting, mobile industry analyst and chair of the Wi-Fi Offload Summit. "In my view, Cloud4Wi is tackling the Wi-Fi monetization challenge in all the right ways. Right now, it is possible to add a great deal of value to a variety of public venues with managed Wi-Fi solutions like those of

4

## **⊕** CLOUD4WI

Ivan Muccini and Brodie Kirkeby, Vice President of USA Sales, will present the Cloud4Wi Proximity application during Monetization Day at the Wi-Fi Offload Summit on Wednesday, June 18 at 2:15 p.m. PDT. For more information about Cloud4Wi or Proximity, please contact info@cloud4wi.com. To schedule a face-to-face meeting at the Wi-Fi Offload Summit in Palo Alto, contact Brodie Kirkeby at bkirkeby@cloud4wi.com or call (949) 887-0636.

For media inquiries, please contact:

#### Cloud4Wi

Elena Briola ebriola@cloud4wi.com Tel: +1 (415) 589-9135



#### Related Press Releases



Cloud4Wi Named Top 5 Marketing Vendor in the OnCon Icon Awards

Learn more >



Cloud4Wi appoints Scott A Chief Operating Officer and Member

Learn more >



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#### **Products**

Location-based Marketing

Enterprise Guest WiFi

Digital Check-In

Integrations

Location SDK

Pricing

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Webinars

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Help Center

Partners Company

4



WiFi Manufacturers

Careers

**Application Providers** 

**Press Releases** 

**Events** 

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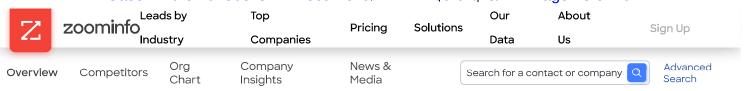
Copyright © 2021 Cloud4Wi. All Rights Reserved.

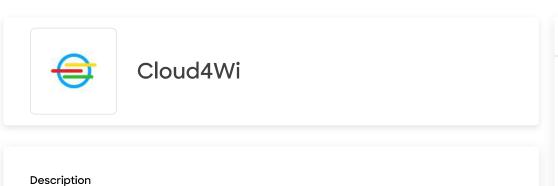


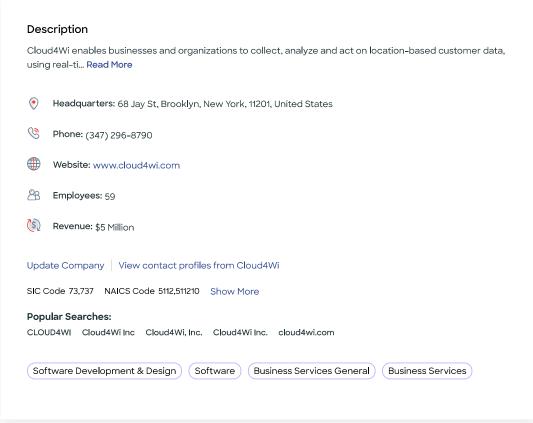
# **EXHIBIT B**

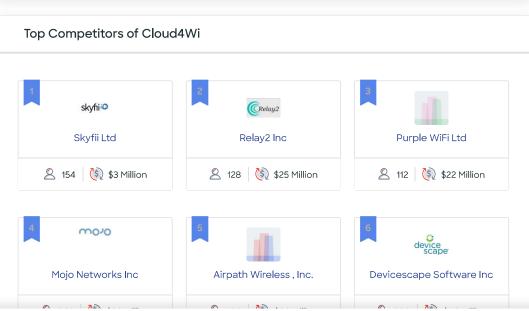
7/1/2021

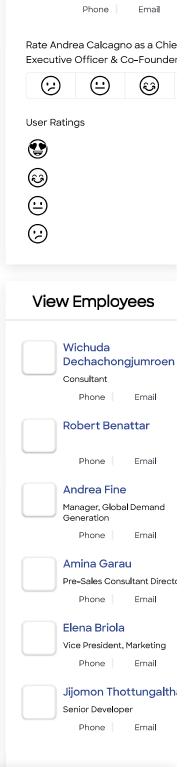
#### Case 1:20-cv-07803-CMoud MOCLOME ONLY & Eiling to Bridge 13 of 40







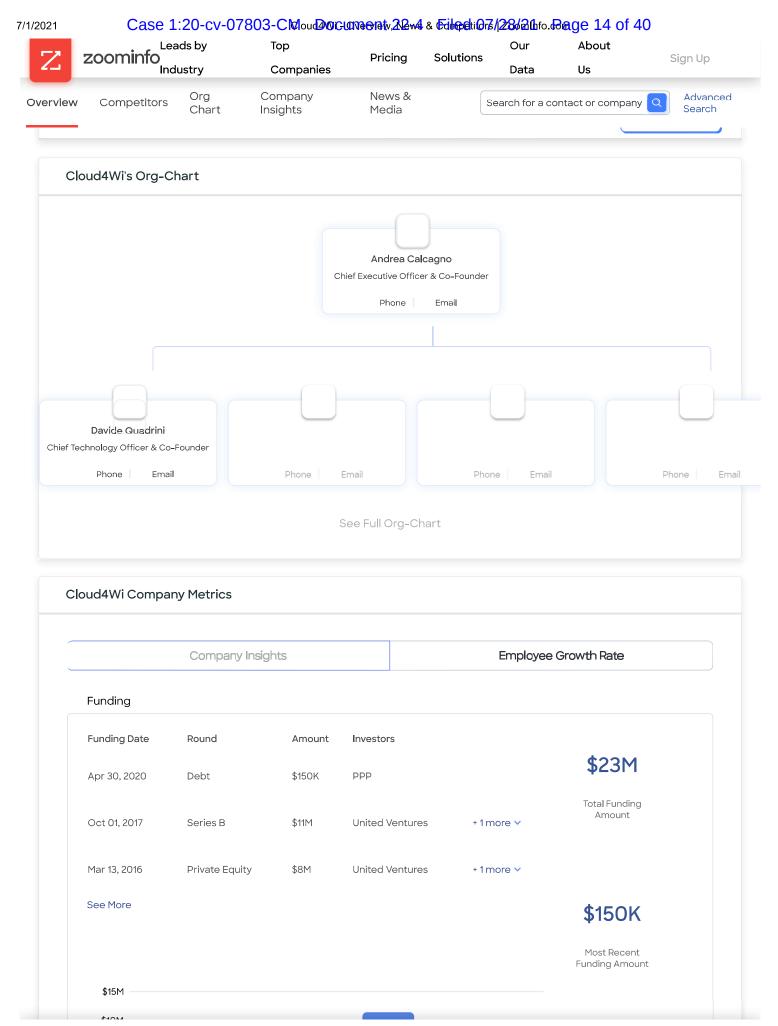




CEO at Cloud4Wi

Founder

Andrea Calcagno Chief Executive Officer & C



See More Acquisitions & Subsidiaries

#### Cloud4Wi's Tech Stack Twitter for Websites **Hubspot Content** WordPress SmartRecruiters Google Font API Glob Management System Ву Ву Ву Ву Ву Twitter HubSpot Automattic **SmartRecruiters** Google GMO Intel See more technologies

#### Cloud4Wi News & Media



#### Cloud4Wi joins the HubSpot App Marketplace in the Lead Generation...

Cloud4Wi fills the offline gap of the digital customer journey with location-based marketing capabilities (PRWeb June 08, 2021) Read the full story at

 $https://www.prweb.com/releases/cloud4wi\_joins\_the\_hubspot\_app\_marketplace\_in\_the\_lead\_generation\_category/prweb17952910.htm$ 

Jun 7, 2021

www.prweb.com



Cloud4Wi Listed as a Representative Vendor for the fourth time in 2021 Gartner Market Guide for

#### Case 1:20-cv-07803-Cloud a component, 22 & Editor (28/26/26) Editor (28/26/26)



May 4, 2021

martechseries.com



#### Cloud4Wi Listed as a Representative Vendor for the fourth time in 2021...

Cloud4Wi fills the offline gap of the digital customer journey with location-based marketing capabilities (PRWeb May 04, 2021) Read the full story at

 $https://www.prweb.com/releases/cloud4wi\_listed\_as\_a\_representative\_vendor\_for\_the\_fourth\_time\_in\_2021\_gartner\_market\_guide\_for\_indoor\_location\_application\_platforms\_report/prweb17910596.htm$ 

May 3, 2021

www.prweb.com

Subscribe to "Cloud4Wi" News

#### Companies Visiting Cloud4Wi Page Most Often

People from these companies have recently viewed Cloud4Wi profile:



#### Frequently Asked Questions regarding Cloud4Wi

#### Where are Cloud4Wi's headquarters?

Cloud4Wi's headquarters are in 68 Jay St, Brooklyn, New York, 11201, United States

#### What is Cloud4Wi's phone number?

Cloud4Wi's phone number is (347) 296-8790

#### What is Cloud4Wi's official website?

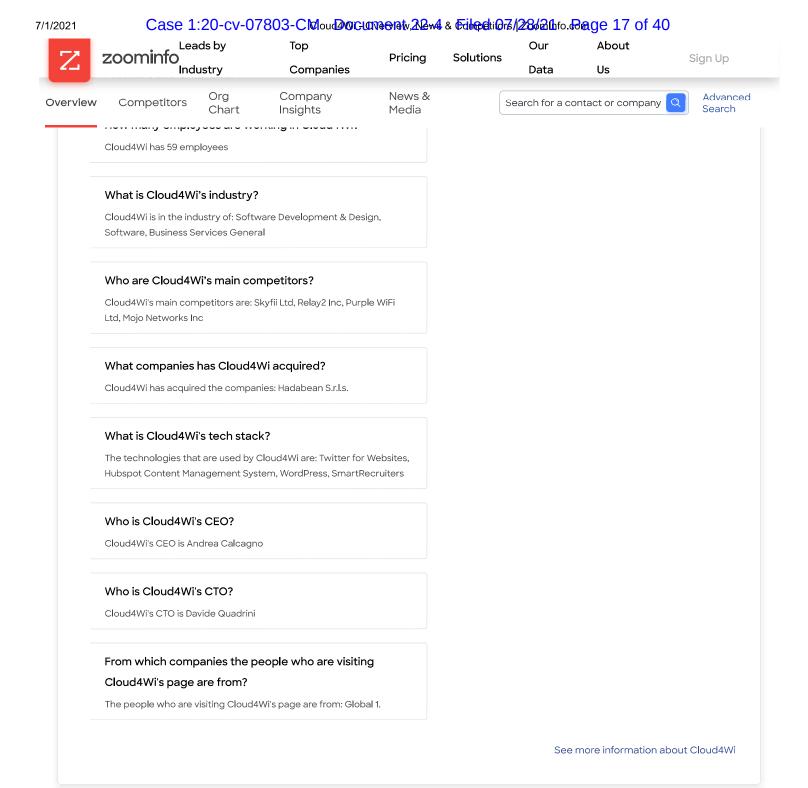
Cloud4Wi's official website is www.cloud4wi.com

#### What is Cloud4Wi's Revenue?

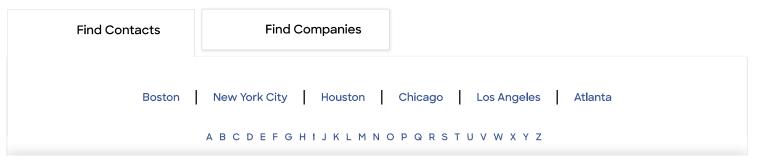
Cloud4Wi's revenue is \$5 Million

#### What is Cloud4Wi's SIC code?

Cloud4Wi's SIC: 73,737



#### **Browse ZoomInfo's Directories**



7/1/2021

#### Case 1:20-cv-07803-Cldoud wich one one with 20 the distribution of the control of

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	POPULAR FEAT	<b>TURES</b>	COMPANY	B2E	DATABASE		MORE RESOURCES	Free
	Sales Solutions		About Us	Oui	Data		ZoomInfo Videos	Trial
	Marketing Solu	tions	Our Leadership	Dat	a Transparenc	у	Newsroom	Login
	Company Cont Search	tact	Investor Relations		date Your mpany		Engineering Blog	866.904.9666
	Buyer Intent Da	ata	FAQs	Cla	im Profile		COVID-19 Newsfeed	
	CRM Lead Enric	chment	Careers	Bro	wse Directorie	es.	Recipes for Success	
			Contact Us	Ped	ple Search		Privacy Center	
				Cor	mpany Search			

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# **EXHIBIT C**

# crunchbase



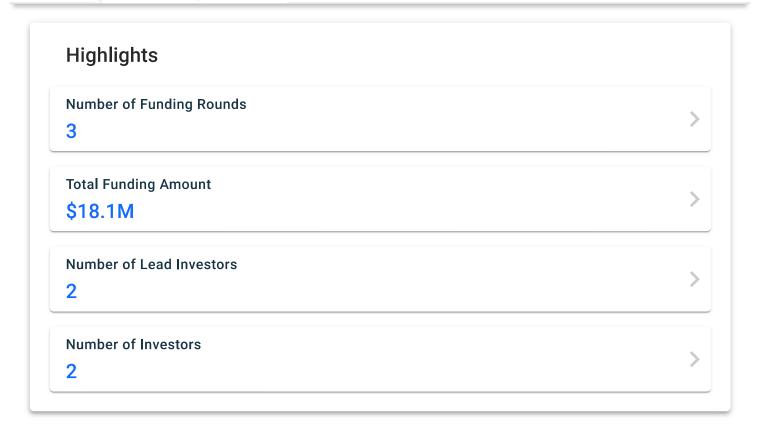
Summary

**Financials** 

People

Technology

Signals & News



## **Funding**

Cloud4Wi has raised a total of \$18.1M in funding over 3 rounds. Their latest funding was raised on Feb 18, 2020 from a Debt Financing round.

Cloud4Wi is funded by 2 investors. Opus Capital and United Ventures are the most recent investors.

Cloud4Wi has acquired 2 organizations. Their most recent acquisition was WiTech SpA on Aug 13, 2018.

## **Funding Rounds**

**Number of Funding Rounds** 

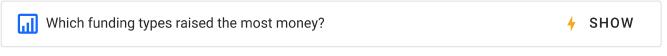
**Total Funding Amount** 

3

\$18.1M

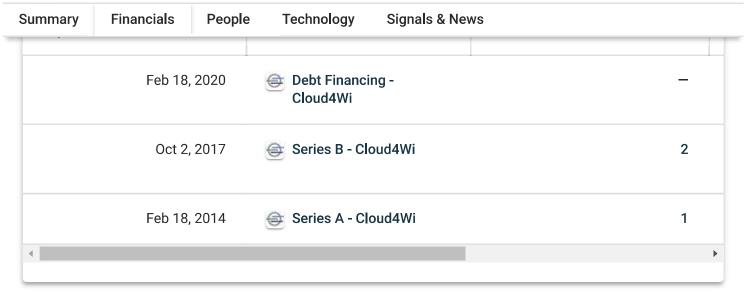
Cloud4Wi has raised a total of \$18.1M in funding over 3 rounds. Their latest funding was raised on F. 2020 from a Debt Financing round.

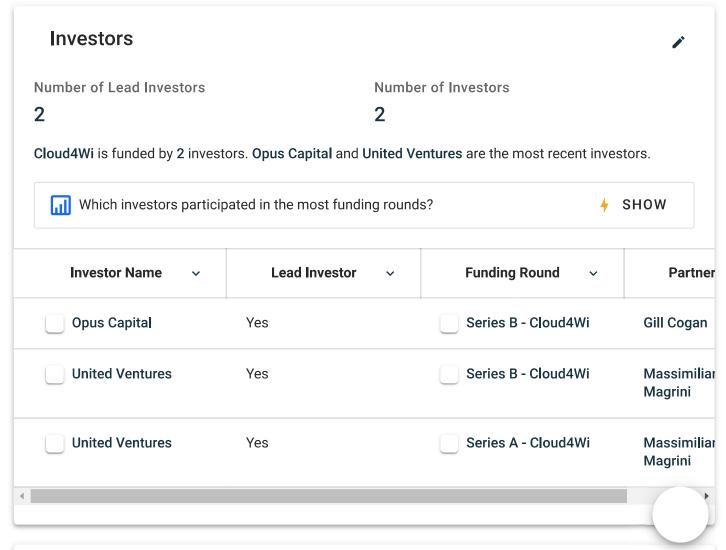
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SAVE



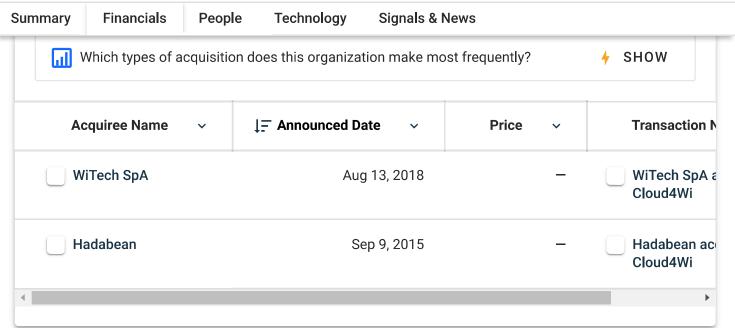


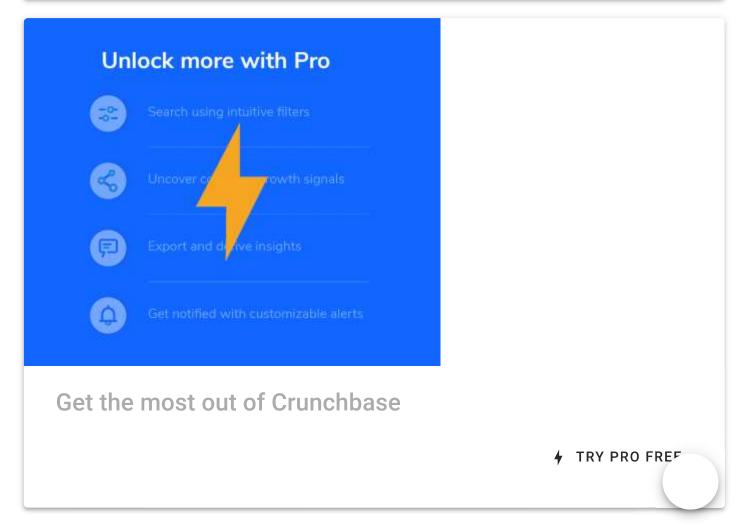
#### **Acquisitions**





SAVE





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SAVE

Summary Financials People Technology Signals & News



# **EXHIBIT D**









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Overview

Competitors

**Acquisitions** 

**Funding** 

**News & Insights** 

### Cloud4Wi

Cloud4Wi is a cloud-based platform that provides location infused customer engagement solutions for businesses.

#### Read more

Est. Annual Revenue

\$10M

Agree?

Yes

No

No

Est. Employees

79

Agree?





Sector

#### **Systems Software**

Internet Software, Artificial Intelligence (AI), Location Based Services

Headquarters

New York, New York

**New York Metropolitan Area** 



CEO Approval Rating









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Ove	rview	Competitors	Acquisition	s Fun	ding	News & I	nsights
RANK	COMPANY	Y CEO	CEO RATING	EMPLOYEES	FUNDING	REVENUE	
	⊕ CLOUD4V	Andrea Calcagno Co-Founder CEO	<sub>&amp;</sub> 83/100	79	\$18.1M	\$10M	
1	KodaCloud	Bernard Herscovici Founder & C	58/100 EO	35	\$10M	\$2.5M	View Profile
2	<b>//</b> eleve	Peri Pierone CEO	81/100	40	\$125K	\$8M	View Profile
3	purpk	Gavin Wheeldon CEO	80/100	105	\$12M	\$12M	View Profile
4		Wayne Arthur CEO	80/100	3	\$3.5M	\$ < 1M	View Profile
5		Seale Moorer CEO	80/100	150	\$75M	\$120M	View Profile
6		Teo Wee Tuck CEO	60/100	99		\$3.3M	View Profile
7		Nigel Wesley Founder & CEO	47/100	56	\$5M	\$1.5M	View Profile
8		Stephane Boisvert CEO	90/100	100		\$21.5M	View Profile









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Overview	Competitors	Acquisitions	Funding	News & Insights
Campbell, Ca	s perceived as one of alifornia, and was foui ustry. KodaCloud gen	nded in 2014. KodaCl	loud operates in	d's headquarters is in the Telecommunication
company tha	ess has been one of C at was founded in 200 d. Compared to Cloud	02 in Portland, Orego	on. Eleven Wirele	ess is in the Application
·	ud4Wi's #3 rival. Purp ation Software indus			} in 2012. Purple operates enerates \$2M more









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Overview Competitors Acquisitions Funding News & Insights

June 29, 2021 Purple Blog

Purple partners with U.S. based Exit Design

Purple has teamed up with Exit Design, a leading experiential graphic design firm that produces compr... See more »

Today 11:41 AM MarketScreener

Fortinet: Security Must Accompany 5G Implementation, Not Follow It (marketscreener.com) 5G is accelerating opportunities for enterprises and mobile network operators al... See more »

## **Cloud4Wi Acquisitions**

COMPANY ACQUIRED

ACQUISITION DATE

Aug 2018

Source »









⊕ CL	.OUD4W	<b>1,398</b> Followers on Owler			
Overview	Competitors	Acquisitions	Funding	News & Insights	
ROUND	FUNDING DAT	E AMOU	NT	INVESTORS	
Dobt	Feb 2020	¢2 E1			
Debt	Feb 2020	\$2.51	VI	<del>-</del>	
Series B	Oct 2017	\$11.5	M	<b>~</b>	
					-

\$4M

Mar 2014

Series A









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Overview Competitors Acquisitions Funding News & Insights

These are all the companies that Cloud4Wi has invested in. Cloud4Wi's latest investment was WiTech S.r.l. in Aug 2018. WiTech provides WiFi connectivity monetization, network planning and technology consulting services.

# June 8, 2021 destinationCRM Cloud4Wi Integrates with HubSpot Cloud4Wi joins the HubSpot App Marketplace and integrates its location-based marketing tech with HubS... See more » June 7, 2021 Virtual-Strategy Magazine

Wi-Fi Analytics Market Growing at a CAGR 26.0% | Key Player Cisco, SkyFii, Cloud4Wi,

Cisco Systems (US), Aruba Networks (US), Purple WiFi (UK), Cloud4Wi (US), Fortinet (US),

Fortinet, Hughes Network Systems

Ruckus Netwo... See more »









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Overview	Competitors	Acquisitions	Funding	News & Insights
	January 27, 2021 Mart	ech News		
	Location Technolog Cloud4Wi, the indust announced that it wa	try's leader in location	•	Marketing Vendor ner insights technology,
	October 9, 2020 SEC			
	Cloud4Wi, Inc. raise See more »	s funding		
	February 20, 2019 IT N	News Africa		
	Look to Wi-Fi for Dig ClOs in the retail sec sophisticated Wi Se	tor are increasingly		ion analytics provided by
	November 9, 2018 Tel	ecompaper		
	Corr-Serve selects C (Telecompaper) Distr its portfolio. It sai <b>Se</b>	ributor Corr-Serve h		fering in SA ne addition of Cloud4Wi to
	July 4, 2018 Ms Cherry	y Legal		
	Global Wi-Fi Analyti Zebra Technologies		sco Systems, Sl	kyfii, Purple, July Systems,
	The market research Analytics Market with		omprehensive r	eview on Global Wi-Fi
	February 6, 2018 Spac	ceGab		
	New Guest WiFi, Lo Capabilities Design	<u> </u>	d Location-Bas	sed Marketing









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verview	Competitors	Acquisitions	Funding	News & Insights
April 13, 2021 Cloud4wi Blog				
Solution Pr		_	·	ng bundle for WiFi nnology, and Tanaza, a
	e <b>See more »</b>		J	
February 2, 2 Cloud4wi Blog				
	returns to the Wirel choice to join the O			I port stop for the
	EW YOR See more		ve was a natura	in hext step for the
January 15, 2 Cloud4wi Blog				
	Offering Outstandi ding & Engaging V	•	e Product Suit	es For Better
	oud4Wi: Offering Ou		e Grade Produc	t Suites For Better









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Overview Competitors **Acquisitions** Funding **News & Insights** January 15, 2021 Cloud4wi Blog Il mio pranzo con il Presidente della Repubblica in Silicon Valley The post «Il mio pranzo con il Presidente della Repubblica in Silicon Valley» appeared first on Cloud... See more » January 15, 2021 Cloud4wi Blog La plateforme de Cloud4Wi disponible chez Config The post La plateforme de Cloud4Wi disponible chez Config appeared first on Cloud4Wi.... See more » January 15, 2021 Cloud4wi Blog "Vi spiego come fatta la comunit italiana in Silicon Valley e come far rientrare i talenti" The post "Vi spiego come & egrave; fatta la comunit& agrave; italiana in Silicon Valley e come far rien... See more » January 15, 2021 Cloud4wi Blog Cloud4Wi, la startup pisana che ha ricevuto 12 milioni di dollari The post Cloud4Wi, la startup pisana che ha ricevuto 12 milioni di dollari appeared first on Cloud4Wi... See more » November 9, 2020 Cloud4wi Blog Marketing Awards Update: Cloud4Wi is a Finalist for OnCon's Top 25 Marketing Vendor Award! We're he wond thrilled to announce that Cloud 4 Wi has been selected as a finalist









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**Overview Competitors Acquisitions Funding News & Insights** 

Cloud4Wi, provider of the industry's leading location service solutions, today announced its recent a... **See more** »

July 10, 2017
PRWeb

Cloud4Wi Wins Prestigious Digital360 Fashion/Retail Awards
Innovative Wi-Fi services platform leader honored for its role in transforming in-store customer expe... See more »



July 10, 2017 streetinsider

Cloud4Wi Wins Prestigious Digital360 Fashion/Retail Awards

Cloud4Wi, provider of Volare, the industry's leading services platform for advanced guest Wi-Fi, toda... **See more** »



October 3, 2016 Press Release Rocket

Cloud4Wi's VolareXP Enables Service Providers to Offer Marketing Services over Wi-Fi to Small and Medium Businesses

Broadband operators can empower their customers with business-building









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Overview	Competitors	Acquisitions	Funding	News & Insights
	April 14, 2016 PRWeb			
	Cloud4Wi Named A		vation Assard SA	inner By The San
	Francisco Business		alion Award vv	Illier by The San
			ecoanized for lea	adership(PRWeb April 14,
	2016)Read the full st	·	3	
	March 16, 2016 PRWe	eb		
	Cloud4Wi Introduc for Guest Wi-Fi	es Volare , the First	True Brand-Bu	ilding Services Platform
	New marketing and	management capa	bilities demo at	Retail Week Live, Booth
	#42(PRWeb March 1	5, 2016)Re <b>See mo</b> l	re »	
	February 9, 2016 PRV	Veb		
	Cloud4Wi Recogniz Enterprise Network	<b>O</b> ,	WLAN Solution	Providers of 2016 by
	•	•	en recognized in	Enterprise Networking's
	list of Top 10 WLAN S	Sol See more »		
	December 3, 2015 Ma	arketwired		
	Hub One Selects C	loud4Wi for Its Nev	v Wi-Fi Offering	1
	French Telecom Cor Platform <b>See more</b>		tspot-as-a-Serv	ice" Based on Cloud4Wi
Cloud4W	i Videos			See all articles »









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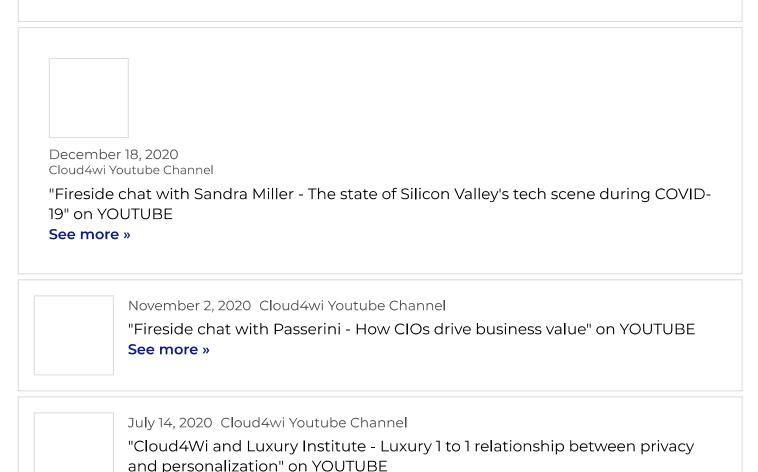
Overview Competitors Acquisitions Funding News & Insights

January 21, 2021

Cloud4wi Youtube Channel

"Luxury Unlocked - How digital transformation is reshaping the luxury experience" on YOUTUBE

See more »



March 4, 2020 Cloud4wi Youtube Channel

"Cloud4Wi for Salesforce Marketing Cloud" on YOUTUBE

See more »

See more »









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Overview Competitors Acquisitions Funding News & Insights

June 13, 2017 Cloud4wi Youtube Channel
"Corporate Cuest Wifi in 60 seconds" of

"Corporate Guest Wifi in 60 seconds" on YOUTUBE
See more »

October 10, 2016 Cloud4wi Youtube Channel

"Introducing VolareXP" on YOUTUBE

See more »

#### **Social Media**

Social Media Links







## **Cloud4Wi Headquarters**

68 Jay Street New York, New York11201

347-296-8790

**Driving Directions »** 









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**Overview Competitors Acquisitions Funding News & Insights** 

StarStone | Nextlink Internet | FanDuel | Telford Homes | Digital Realty |
CarbonChain | Blackberry | Mercury Systems | Mastercard | Builders FirstSource |
Regeneron

#### **PEOPLE ALSO VIEWED**

Redis Labs Ltd. | CyberGrants | Datavail Corp. | MobiSwipe | Little Bird Technologies | talech | Tresorit | Eka | Secure Code Warrior Pty. Ltd. | Mi9 Retail | Compunnel | Moka | Shuttlerock | TrustMarque | eLocal | Timken | Rothschild | Brocade | Rochester Drug | Grupa Interia.pl Sp. z o.o. | The&Partnership | Bluesoft Sistemas | CONFORMiT | Resco.net, Inc. | Owls | CTDI GmbH | DataDome | The Olayan Group | Suyati Technologies | Varicent Software Incorporated

## **Cloud4Wi Summary**

**ABOUT** 

Overview

Cloud4Wi is a cloud-based platform that provides location infused customer engagement solutions for businesses. Cloud4Wi was founded in 2014. Cloud4Wi's headquarters is located in New York, New York, USA 11201. It has raised 18.1M in 3 rounds. The lat...

See more

CEO









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Overview Competitors Acquisitions Funding News & Insights

Cloud4Wi was founded in 2014

#### Who is Cloud4Wi's CEO?

Cloud4Wi's CEO is Andrea Calcagno

#### How much revenue does Cloud4Wi generate?

Cloud4Wi generates \$10M in revenue

#### How much funding does Cloud4Wi have?

Cloud4Wi has historically raised \$18.1M in funding

#### Where is Cloud4Wi's headquarters?

Cloud4Wi's headquarters is in New York New York, USA

#### How many employees does Cloud4Wi have?

Cloud4Wi has 79 employees

#### What sector does Cloud4Wi operate in?

Cloud4Wi is in Systems Software, Internet Software, Artificial Intelligence (AI)

#### Who are Cloud4Wi's competitors?

Cloud4Wi's top competitors are KodaCloud, Eleven Wireless, Purple

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